

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

REC'D TN
REGULATORY AUTH.

Re: Petition of Cinergy Communications)
Company for Arbitration of an)
Interconnection Agreement with BellSouth)
Telecommunications, Inc. pursuant to the)
Telecommunications Act of 1996.

Docket No. 01-000987

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OFFICE OF THE
EXECUTIVE SECRETARY

**RESPONSE OF CINERGY COMMUNICATIONS COMPANY TO DATA REQUEST OF
BELL SOUTH TELECOMMUNICATIONS, INC.**

Cinergy Communications Company ("Cinergy") hereby is providing its response to the Data Requests of BellSouth Telecommunications, Inc. filed April 30, 2002.

DATA REQUESTS

1. State the number of residential customers in Tennessee for whom you are currently providing local service.

ANSWER: 40

2. What percentage of the customers identified in response to No. 1 are located in BellSouth's Tennessee service territory.

ANSWER: 100%

3. State the number of access lines you are providing to your residential customers in TN and the percentage in BellSouth's Tennessee service territory.

ANSWER: 67

4. For the access lines identified in response to No 3 above, state how many are BellSouth lines you are reselling and how many are provisioned with UNE loops and/or UNE-P's purchased from BellSouth.

ANSWER: 100% resale

5. State the number of business customers in Tennessee for whom you are currently providing local service.

ANSWER: 556

6. What percentage of the customers identified in response to No. 5 are located in BellSouth's Tennessee service territory?

ANSWER: 100%

7. State the number of access lines you are providing to your business customers in Tennessee and the percentage in BellSouth's Tennessee service territory.

ANSWER: 2744

100% in BellSouth territory

8. For the access lines identified in response to No. 7 above, state how many are BellSouth lines you are reselling and how many are provisioned with UNE loops and/or UNE-P's purchased from BellSouth.

ANSWER: Resale 148

UNE 2596

9. If you claim that you are impaired in your ability to provide service to customers in Tennessee without the ability to purchase unbundled packet switching from BellSouth, provide all analyses and contentions that you claim support your impairment argument.

ANSWER: This information was previously provided to BellSouth in the related Kentucky arbitration case. Cinergy Communications Company reserves the right to supplement this response as additional information is developed.

10. Provide all documents that you contend support any assumptions used in such impairment analyses.

ANSWER: See response to 9 above.

11. State whether you have received any price quotations for DSLAM equipment. If you have, provide the details of all quotations and all documents concerning such quotations.

ANSWER: Net to Net Technologies information disclosed in Pat Heck's deposition in the Kentucky arbitration. Inquiries were made to other companies, but we did not receive quotes because all contained ATM ports.

12. State the number of access lines you have served in Tennessee for both residential and business customers in each month for the past 12 months.

ANSWER: May 2001: Business 333; Residential 15
June 2001: Business 595; Residential 15
July 2001: Business 767; Residential 17
August 2001: Business 832; Residential 20
September 2001: Business 1059; Residential 22
October 2001: Business 1223; Residential 23
November 2001: Business 1317; Residential 28
December 2001: Business 1426; Residential 36
January 2002: Business 1491; Residential 42
February 2002: Business 1642; Residential 46
March 2002: Business 1894; Residential 50
April 2002: Business 2281; Residential 57
May 2002: Business 2749; Residential 67

13. State your churn rate in Tennessee for customers for whom you provide local service.

ANSWER: 6.15% based upon a 6 month average.

14. State the number of former Cinergy local service customers in Tennessee that have discontinued service with Cinergy in order to become customers of BellSouth. For any, please identify the name of the customer, the date Cinergy began providing local service to the customer, and the date Cinergy discontinued providing service to the customer.

ANSWER: Cinergy believes this request is irrelevant and unduly burdensome.

15. If you contend that any BellSouth DSL customer in Tennessee determined not to become a Cinergy customer due to the fact that the customer believed that it would no longer be able to keep its DSL service, identify that potential customer with its name, address, and telephone number, state the date(s) Cinergy solicited the potential customer, and state what the potential customer said with respect to the alleged inability to continue to receive DSL service.

ANSWER: Cinergy Communications Company is looking for documentation supporting this interrogatory and will supplement this response when its investigation is complete.

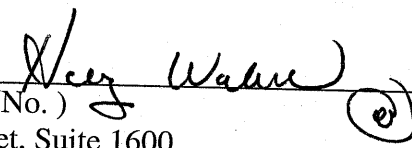
16. Produce all documents that you contend support your positions in this arbitration.

ANSWER: Documentation has been previously provided to BellSouth in the related Kentucky arbitration case. Cinergy Communications Company reserves the right to supplement this response as additional documentation is located.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____


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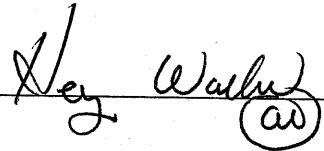
Counsel for Cinergy Communications Company.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 21st day of May, 2002.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St. Suite 2101
Nashville, TN 37201-3300

Henry Walker

A handwritten signature in cursive script that reads "Henry Walker". The signature is written over a horizontal line. The letter "H" is large and stylized, and the word "Walker" is written in a fluid cursive. At the end of the signature, there is a small circle containing the letters "ad".